



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 29, 2021

BY ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte*,
S3 17 CR. 548 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter to propose a pretrial motions schedule, pursuant to the Court's order dated November 9, 2021 (D.E. 580). The Government proposes the following schedules for pretrial motions and for filings pursuant to the Classified Information Procedures Act ("CIPA"), 18 U.S.C. App. 3. The Government discussed the proposed pretrial motions schedule with the defendant during a phone call and sent the proposed schedule to the defendant in a letter on November 23, 2021. The defendant stated that he wished to review the proposed schedule with standby counsel. The Government not yet received any further response.

CIPA filings

January 28, 2022:	Notices pursuant to CIPA Section 5 by the defendant
February 25, 2022:	Motions pursuant to CIPA Section 6(a) by the Government
March 18, 2022:	Responses to Government's CIPA Section 6(a) filing
Week of April 11, 2022:	Hearing to resolve CIPA Section 6 matters

Pretrial motions and filings

April 8, 2022:	Motions <i>in limine</i> and requests to charge
April 29, 2022:	Responses to motions <i>in limine</i> and requests to charge (No replies unless ordered by the Court)
May 16, 2022:	Final pretrial conference

The proposed schedule is based on the currently scheduled trial date of May 23, 2022. Should that trial date change, the proposed schedules could be adjusted accordingly.

cc: Joshua Adam Schulte (by mail)
Standby counsel (by ECF)